

# CullenCollimore pllc

10 East Pearl Street  
Nashua, NH 03060  
p: 603.881.5500  
f: 603.881.5507

BRIAN J.S. CULLEN  
[bcullen@cullencollimore.com](mailto:bcullen@cullencollimore.com)

November 13, 2013

Fred Runyon, pro se  
NH State Prison for Men  
Inmate #86769  
281 North State Street  
P.O. Box 14  
Concord, NH 03302-0014

**Re: Fred Runyon v. Lee, Nashua Police Detective, et al.  
Civil Action No.: 12-CV-290-PB**

Dear Mr. Runyon:

I received your answers to Interrogatories in this matter, a copy of which appear to have been filed with the Federal Court on October 7, 2013. Although I appreciate that you have supplied me with answers to some of the Interrogatories, you have not answered them completely as required by the Court's Order dated September 17, 2013. I have enclosed a further copy of that Order for your review. As you will see at page 8, the Court specifically required that you mail "complete answers to Interrogatories 1-12" within 30 days of the Order. Your answers are not complete.

In particular, you have failed to answer, and I require full responses to, the following interrogatories:

**Interrogatory No 2:**

By this interrogatory the Defendant sought your employment history from 2008 to the present including your wages associated therewith. You did not answer this question at all. Please do so completely.

**Interrogatory No. 3:**

Your answer indicates only that you have suffered from arthritis and PTSD as a result of the officers' actions. If you intended the term "ETC" to be the short form of etcetera, implying that there are other unstated injuries, that is an insufficient and improper response that you must correct immediately. If "ETC" stands for some other injury I am unfamiliar with the abbreviation of, please provide the full medical term.

Fred Runyon, pro se

November 13, 2013

Page 2

**Interrogatory No. 6:**

This interrogatory sought a description of your medical treatment, the specific name of your medical providers, and your medical records relating to this claim. You have not identified the doctors or other medical treaters involved nor supplied any medical records. You also did not execute the release for these medical records. Please answer this interrogatory fully, being sure to provide the specific names of your doctors or other medical care providers and any and all medical records related thereto. I have enclosed a further copy of the medical authorization for you to sign and return along with the answers to interrogatories.

**Interrogatory No. 9:**

By this interrogatory I sought a complete list of your criminal convictions from 2003 to the present. The Court specifically addressed this request in its Order. See Order at page 6 ("the court directs Runyon to answer Interrogatory 9 completely, with respect to both his in-state and out-of-state record of convictions."). Your belated objection that this information is irrelevant was specifically rejected by the Court. As such, it appears that your refusal to provide this information on that basis is in direct contempt of the Court's order. Please provide the full list of your in-state and out-of-state convictions from 2003 to the present as the Court has already ordered.

**Interrogatory No. 10:**

By this interrogatory we requested that you identify each arrest or detention by a law enforcement officer including the date of the arrest or detention, the reason therefore, the name and location of the police department involved in the arrest and its outcome. The only information you provided appears to be arrests by the Nashua Police. Based on the fact that you have also sued the Manchester Police Department with similar allegations, it is clear that your answer is incomplete. Please provide all of the information as requested and as required by the Court's September 17 Order.

**Interrogatory Nos. 11 and 12:**

By interrogatories 11 and 12 the Defendant sought the identification of any witnesses to the events as alleged by you in your Complaint, any expert witnesses you might seek to call. You responded to each of these interrogatories with a one word refusal ("no"). Given that the Court expressly ordered you to answer both of these interrogatories, I am going to assume that your response is not a refusal to comply with the Court's Order but rather a statement that you have no witnesses and no experts. If I am mistaken in that interpretation, please let me know and complete the responses as required.

Finally, your inclusion of nearly enumerable officers in the caption is not a proper amendment to the Complaint, and, as you know, all of your motions to amend have been

Fred Runyon, pro se

November 13, 2013

Page 3

denied. The inclusion of these officers in your caption has no bearing on the actual parties of this case and is rejected by the Defendant.

Please advise me within the next ten (10) days if you are going to supplement these Interrogatories fully, including all of the information identified above including but not limited to the medical records or an executed medical release, a further copy of which is enclosed. Short thereof, I will be asking the Court to dismiss this case for your failure to comply. I have enclosed a stamp self-addressed envelope for you to send me your response.

Very truly yours,



Brian J.S. Cullen

Enclosures

cc: Dawn Burton